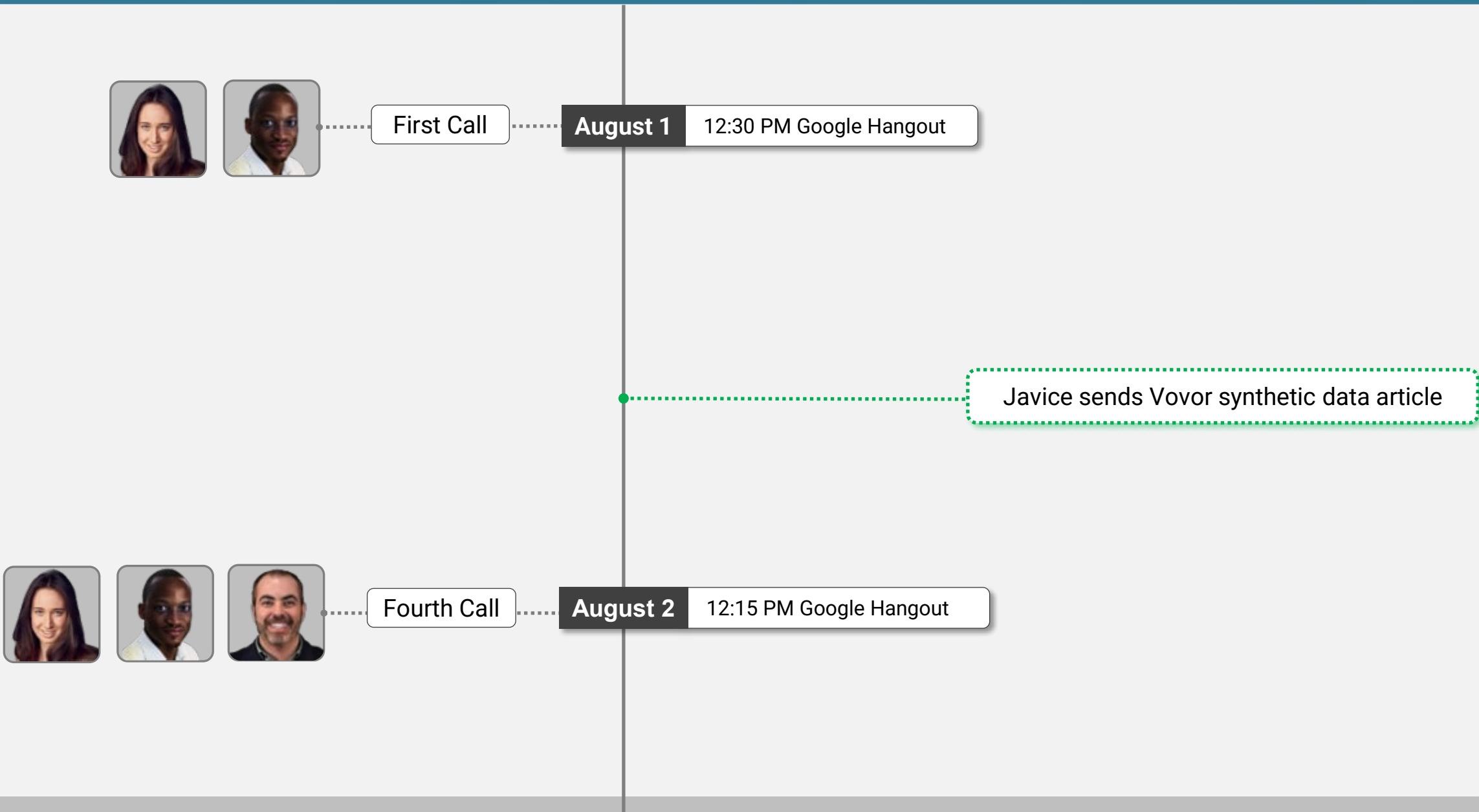


# **EXHIBIT C**

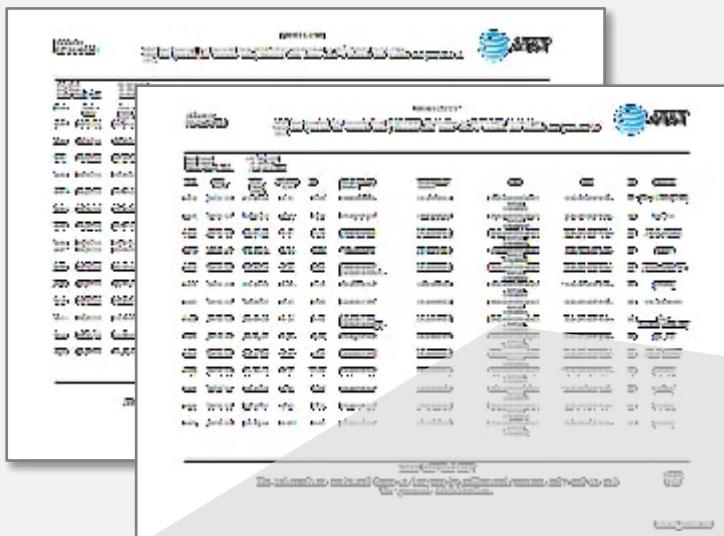
## **PART 3 OF 3**

# The Truth



**No Conspiracy. August 1-2**

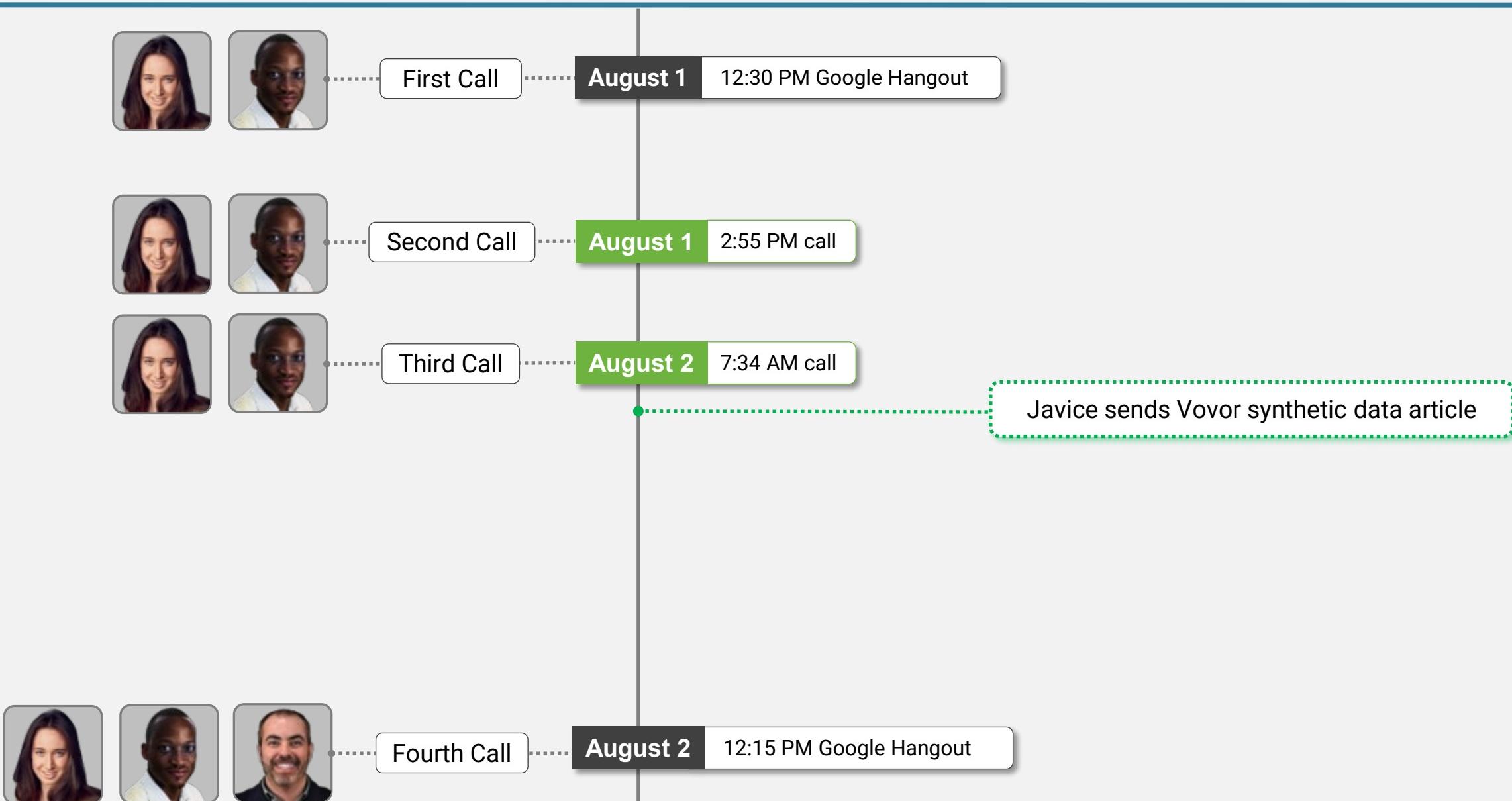
**There Were Two Additional 1-on-1 Calls Before Aug. 2 Google Hangout**



Item	Conn. Date	Conn. Time (UTC)	Seizure Time	ET	Originating Number	Terminating Number	IMEI	IMSI	CT	Feature	
4600	08/01/21	2:55 PM ET	0:08	9:02		9314		0041	[REDACTED]	[REDACTED]	MO [Wi-Fi]
4624	08/02/21	7:34 AM ET	0:17	12:20		9314		0041	[REDACTED]	[REDACTED]	MO [VCORR]

GOVERNMENT  
EXHIBIT  
902  
5123(Cr. 25)(AKH)

# The Truth



# No Conspiracy. August 1-2

## Mr. Vovor Actually Viewed visitors-geo on Aug. 1

**DIRECT  
EXAMINATION**



Peter Manning  
Managing Director

**NAXO**

- Q. Mr. Manning, what action took place, according to this metadata, at . . . 12:53:33 Eastern time?
- A. . . . it's viewed by GAIA ID ending in 582, at the time on August 1, 2021, 12:53:33 Eastern Standard Time.
- Q. And the GAIA ID ending in 582, is that the one associated with patrick@withfrank.org?
- A. That's correct.
- Q. So does this mean on August 1, 2021, . . . patrick@withfrank.org viewed the document Visitors-Geo at 12:53:33 p.m. [ET]?

\* \* \*

- A. Yes, that's correct, viewed this document. That was the action by that user, patrick@withfrank.org.

The screenshot displays a digital document titled "visitors-geo". The document contains the following JSON-like metadata:

```

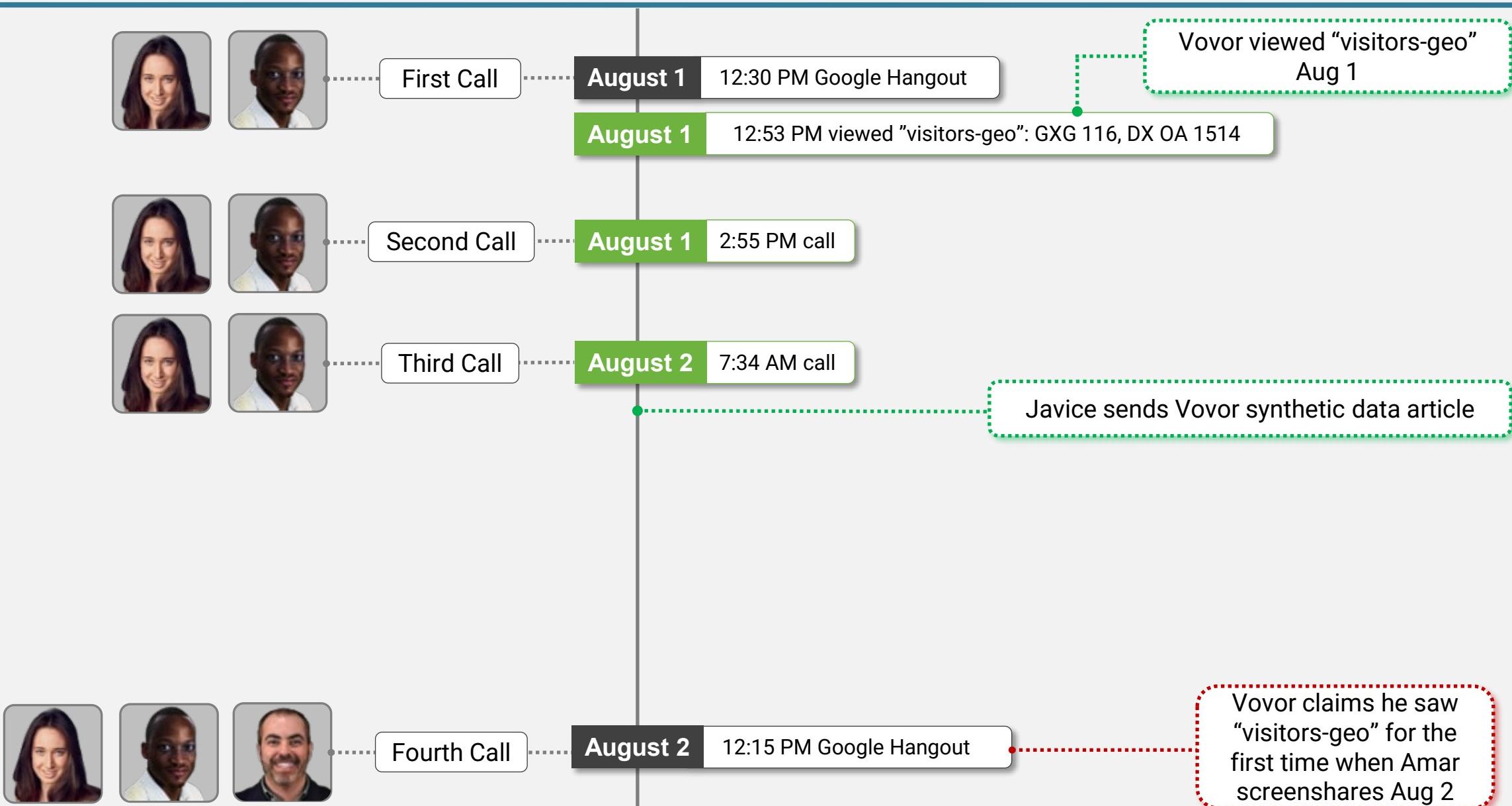
{
  "user_info": [
    {
      "gaia_id": "93937762582",
      "user": {
        "gaia_id": "93937762582",
        "email_address": "patrick@withfrank.org"
      }
    }
  ],
  "time": "2021-08-01 16:53:33 UTC",
  "actor": {
    "user": {
      "unknown_user": {
        "gaia_id": "93937762582"
      }
    }
  },
  "actions": [
    {
      "view": 0
    }
  ],
  "target": {
    "item": {
      "file": {},
      "mime_type": "application/vnd.google-apps.ritz"
    },
    "item_id": {
      "id": "1QopM4myEMxkr_ZNUfpkm5uqVN2JEwj2vdlh7Jaku2hE"
    },
    "title": "visitors-geo"
  }
}
  
```

**12:53 PM ET**

**"title": "visitors-geo",**

**DEFENDANT'S EXHIBIT OA 1514**

# The Truth



# No Conspiracy – August 1-2

## No One Viewed “visitors-geo” on Aug. 2

### VOVOR'S STORY

THE COURT: Do you remember seeing this document [GXG 116] at around the time that you received Ms. Javice's memorandum?

THE WITNESS: I recall seeing this document only on August 2nd.

THE COURT: So your testimony is you did not open this link on the 1st?

THE WITNESS: I don't recall opening it on the 1st.

### CROSS EXAMINATION



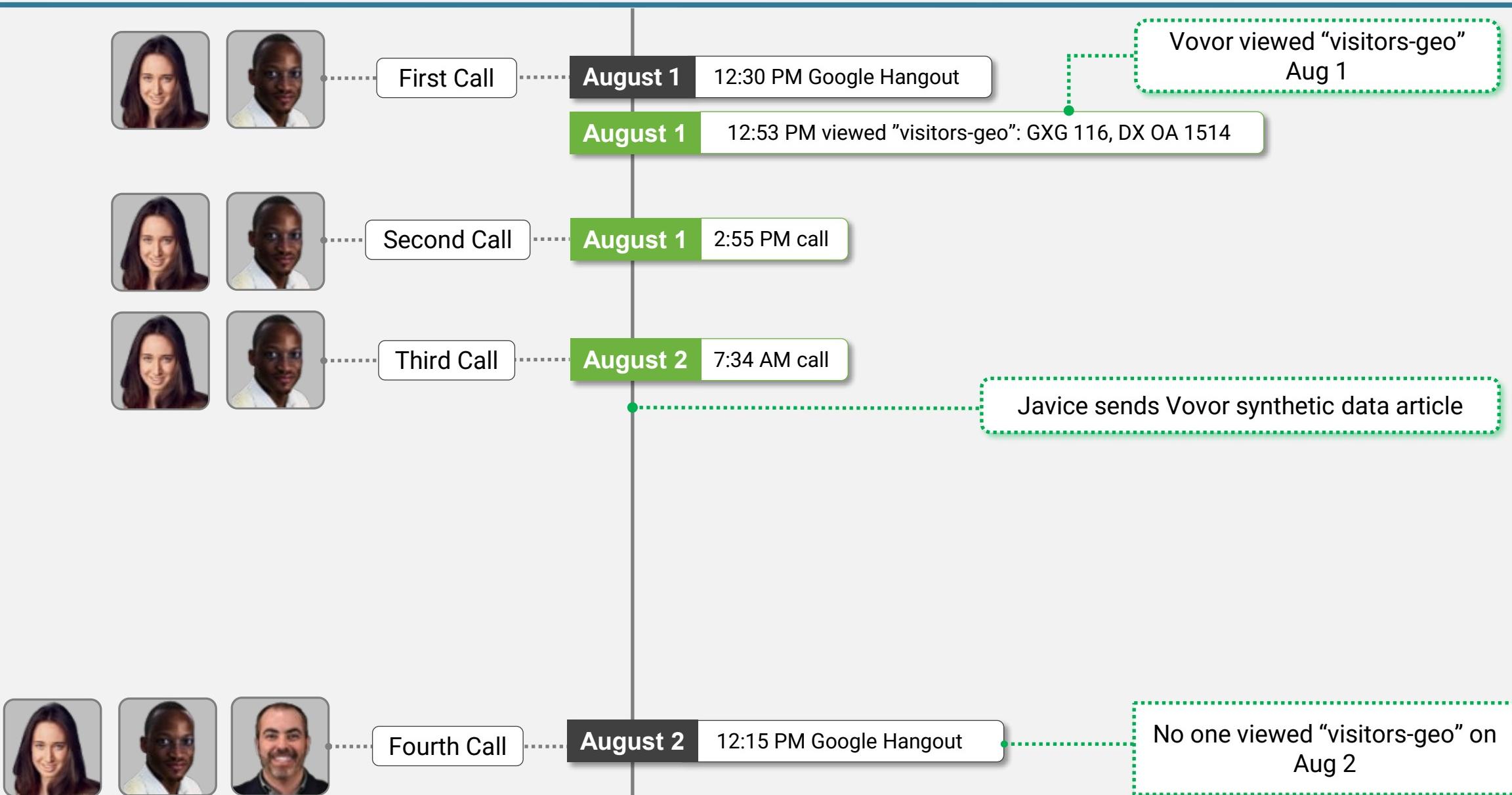
Patrick Vovor  
Director of  
Engineering

F R A N K .

### THE TRUTH

There is no metadata [DX OA 1514] to suggest the “visitors-geo” document [GXG 116] was opened by anyone on August 2.

# The Truth



# No Conspiracy. August 1-2

## Mr. Vovor Actually Viewed data\_request on Aug. 1 During the Call with Ms. Javice

'time": "2021-08-01 16:56:02 UTC",

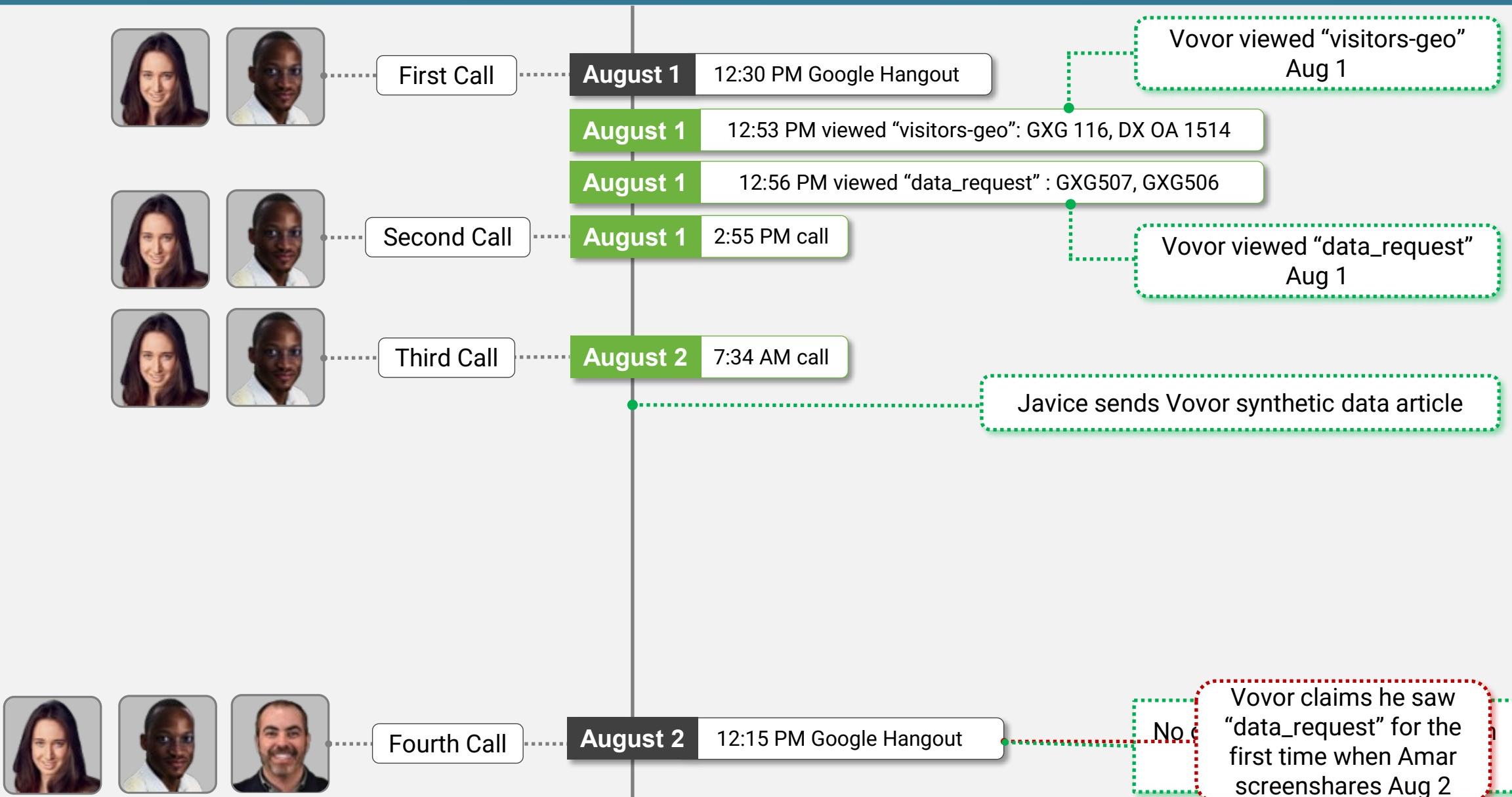
12:56 PM ET

```
{  
  "time": "2021-08-01 16:56:02 UTC",  
  "actor": {  
    "user": {  
      "unknown_user": {  
        "gaia_id": 93937762582  
      }  
    }  
  },  
  "actions": [  
    {  
      "view": {}  
    }  
  ],  
  "target": {  
    "item": {  
      "file": {},  
      "user_info": [  
        {  
          "gaia_id": 93937762582,  
          "user": {  
            "gaia_id": 93937762582,  
            "email_address": "patrick@withfrank.org"  
          }  
        }  
      ]  
    }  
  }  
}
```

"title": "Data\_Request",

GOVERNMENT  
EXHIBIT  
G-507  
SI 23 Cr. 254 (AKH)

# The Truth



## No Conspiracy: August 1-2

### Ms. Javice Asked Mr. Vovor to Pull Data Before Aug. 2 Call

CROSS  
EXAMINATION



**Patrick Vovor**  
Director of  
Engineering  
**F R A N K .**

Q. Does this refresh your recollection that Ms. Javice, before the call, asked you to provide access to customer data so that she could do an analysis?

\* \* \*

A. Yes.

\* \* \*

Q. So that would be 11:45, before the call.

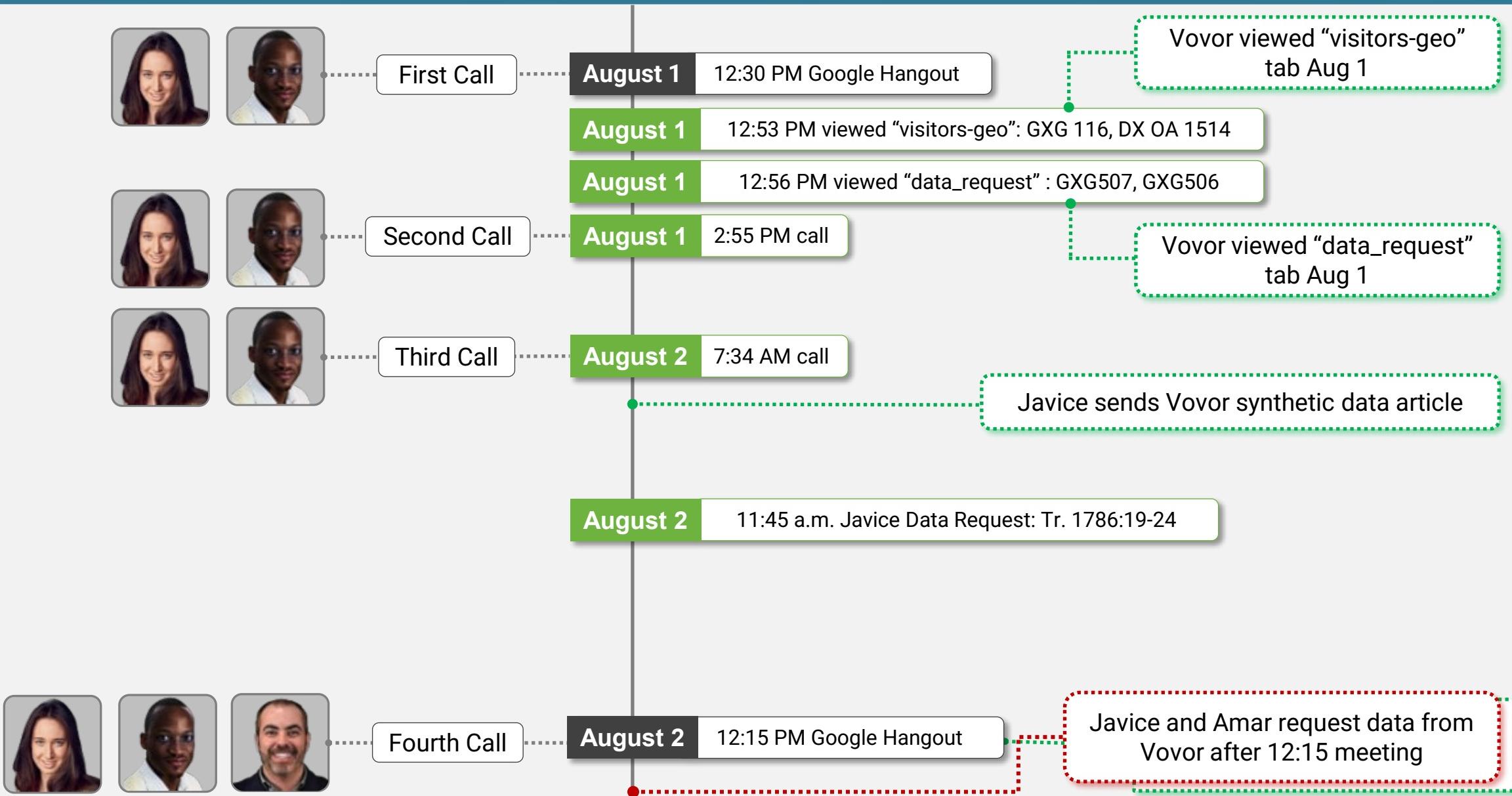
A. Okay.

Q. So does that refresh your recollection that in fact Ms. Javice had asked you to pull the data before the August 2nd call?

\* \* \*

A. Yes.

# The Truth



## NO Conspiracy – August 1-2

### Mr. Vovor Messaged Ms. Wong About Feeling “Not Good” Before Aug. 2 Call

CROSS  
EXAMINATION



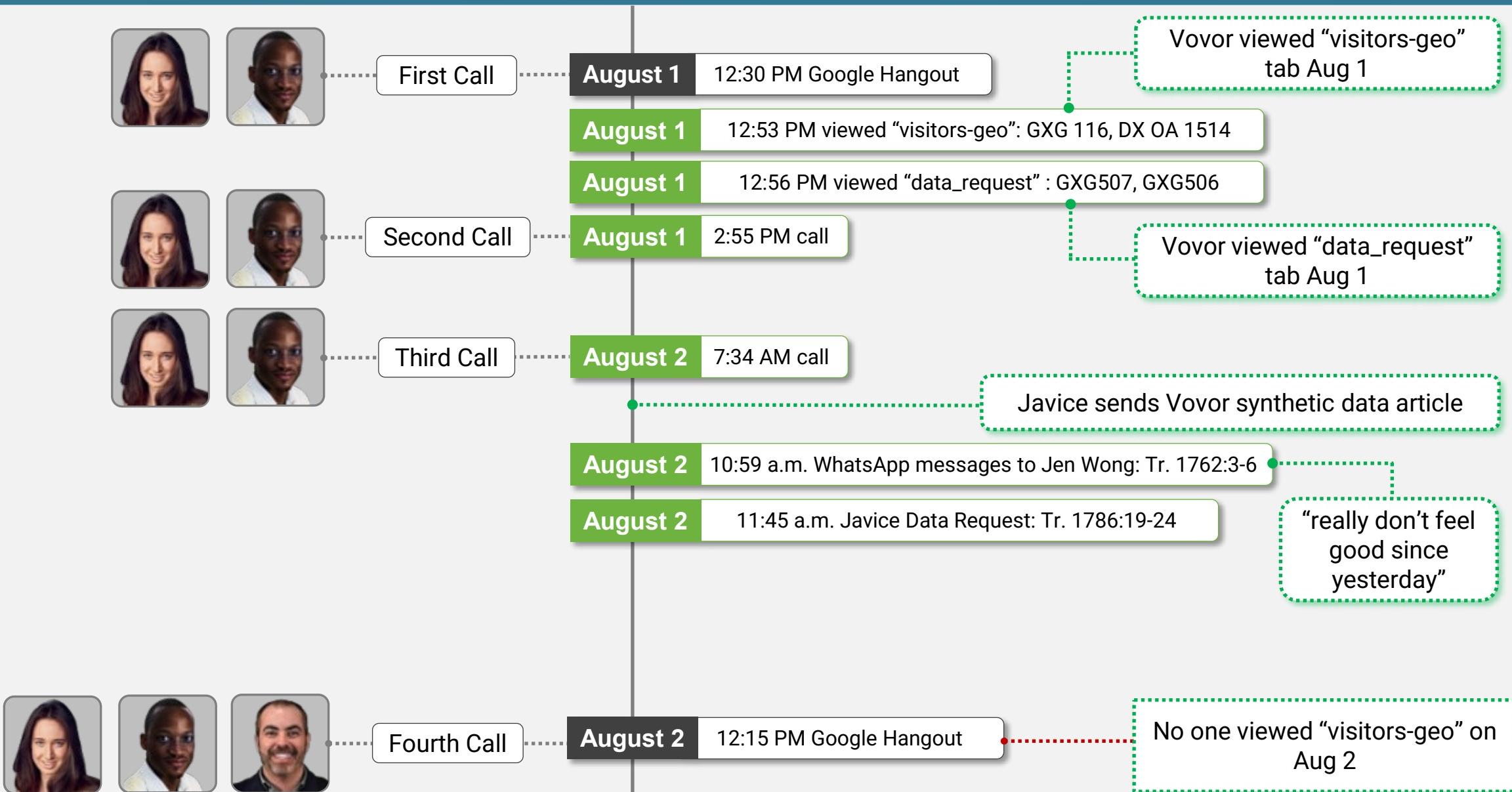
**Patrick Vovor**

Director of  
Engineering

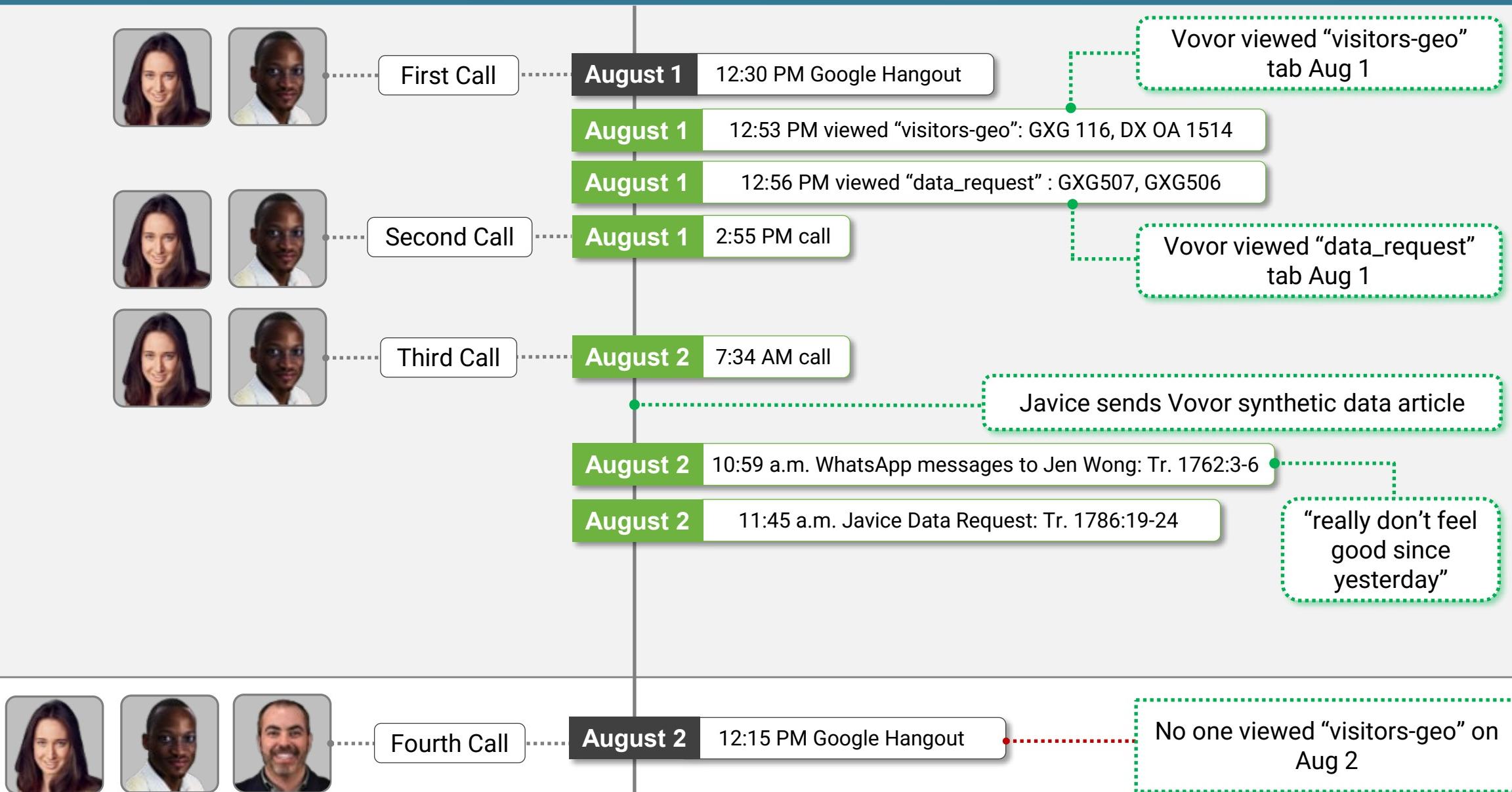
**F R A N K .**

- Q. After you had your first call with Ms. Javice on August 1 at 12:30, fair to say you were already feeling uncomfortable with the request that she made of you?
- A. Correct.
- Q. And, in fact, you reached out to Ms. Wong on WhatsApp the following morning on August 2, did you not?
- A. Correct.
- \* \* \*
- Q. Do you recall, sir, that what you told Ms. Wong before you switched over to Signal was that you really don't feel good since yesterday?
- A. Yes.

# The Truth



# The Truth



## No Conspiracy: August 1-2

Mr. Vovor Repeatedly Said Only He and Ms. Javice Were on the Aug. 1 Call



Patrick Vovor

Director of  
Engineering

F R A N K .

Mr. Vovor testified **7 times** that only he and Ms. Javice were on the August 1 12:30 PM ET call.

## No Conspiracy: August 1-2

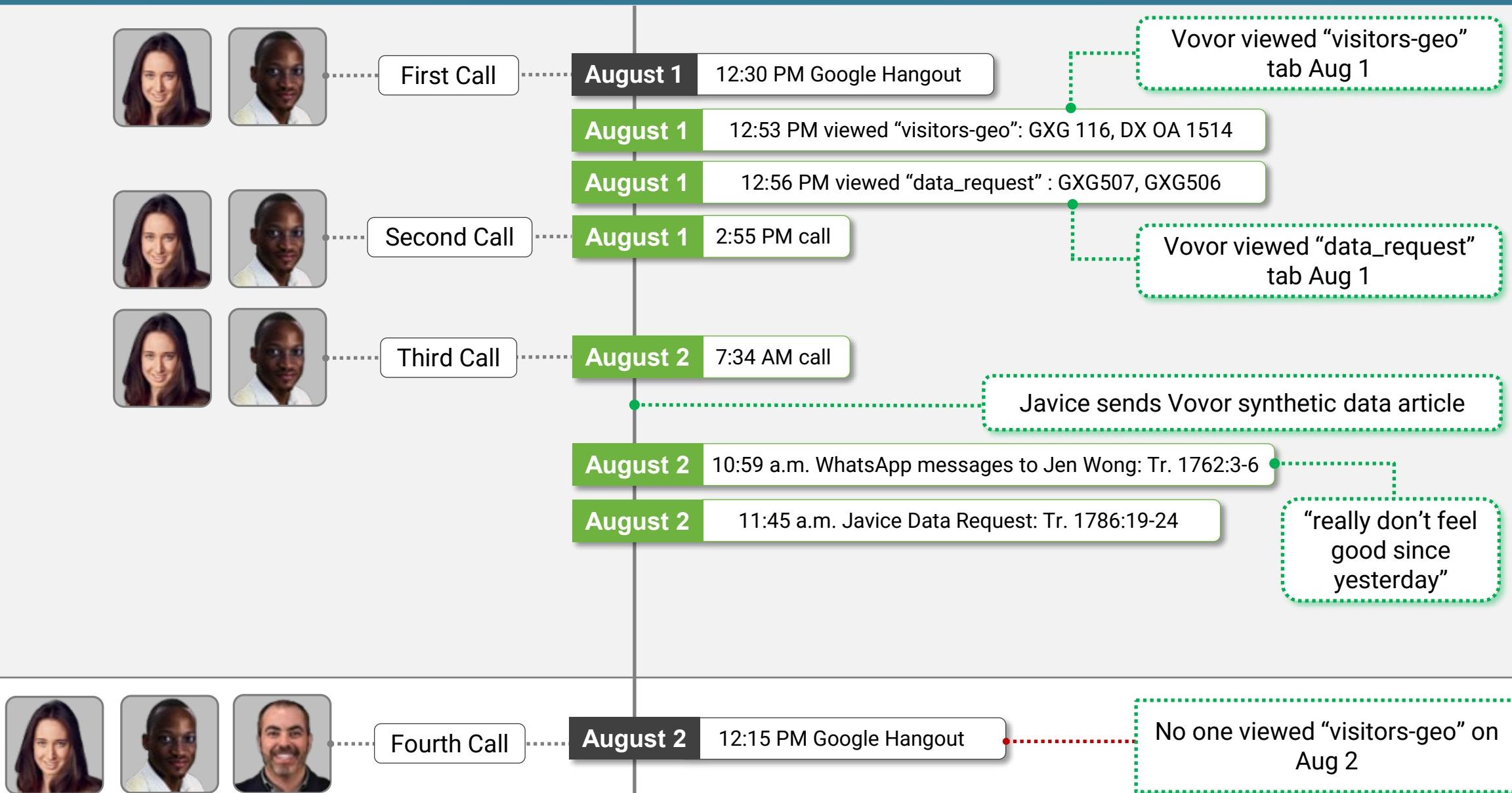
# The Government May Now Pivot That Mr. Amar Was On The Aug 1 Call with Ms. Javice

From: charlie@withfrank.org [charlie@withfrank.org]  
Sent: 8/1/2021 3:49:49 PM  
To: patrick@withfrank.org; olivier@withfrank.org  
  
Subject: Invitation: Data Question @ Sun Aug 1, 2021  
Attachments: invite.ics  
Location: ♦  
  
Start: 8/1/2021 4:30:00 PM  
End: 8/1/2021 5:30:00 PM  
Show Time As: Busy  
  
Recurrence: (none)  
  
Do not edit this section of the description.  
This event has a video call.  
Join: <https://meet.google.com/tan-jxod-fne>  
(US) +1 832-736-0091 PIN: 61597953#  
View more phone numbers: <https://tel.meet/tan-jxod-fne?ll=1>  
View your event at  
[https://calendar.google.com/calendar/event?act=B3axXoZhJhmsub3jh&tctk=MjEjY2hhcmppZUB3axXoZhJhg0Ig8cCz=America%2fNew\\_York&hl=en&es=1...](https://calendar.google.com/calendar/event?act=B3axXoZhJhmsub3jh&tctk=MjEjY2hhcmppZUB3axXoZhJhg0Ig8cCz=America%2fNew_York&hl=en&es=1...)

**From:** charlie@withfrank.org [charlie@withfrank.org]  
**Sent:** 8/1/2021 3:49:49 PM  
**To:** patrick@withfrank.org; olivier@withfrank.org  
  
**Subject:** Invitation: Data Question @ Sun Aug 1, 2021 12:30pm - 1:30pm (EDT) (patrick@withfrank.org)  
**Attachments:** invite.ics  
**Location:** ♦



# The Truth



Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 19 of 61

# No Conspiracy: August 1-2

## The Government’s “Proof” of a Conspiracy

**GOVERNMENT  
EXHIBIT  
902**  
S1 23 Cr. 251 (AKH)

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 20 of 61

# No Conspiracy: August 2 Google Hangout

## Mr. Vovor Is Biased Against Mr. Amar

CROSS  
EXAMINATION



**Patrick Vovor**

Director of  
Engineering

**F R A N K .**

- Q. And after the acquisition you also did not have good interactions with him, correct?
- A. At times, yes.
- Q. In fact, after Frank was acquired by JPMorgan, Mr. Amar became your boss, right?
- A. Correct.
- Q. You were not happy with that.
- A. Correct.
- Q. And your interactions with him continued to be what you would characterize as not great, true?
- A. At times, yes.

CROSS  
EXAMINATION



**Jenny Zeitler**

Marketing  
Automation  
Manager

- Q. Did you have occasion, at the time you were at Frank, to observe—to interact with Mr. Vovor?
- A. Yes.
- Q. And with Mr. Amar and Mr. Vovor together at times?
- A. Yes.
- Q. The two of them, they butted heads, didn't they?
- A. Yes.

# No Conspiracy: August 2 Google Hangout

## Mr. Amar Was Not Involved in Synthetic Data Request

### DIRECT EXAMINATION



Patrick Vovor

Director of  
Engineering

F R A N K .

#### PATRICK VOVOR DIRECT

- Q. What did Mr. Amar ask you to generate?
- A. So a big list of 4 million users which would have the same FAFSA properties in terms of statistical properties as the real data set that we had in the—our FAFSA database.

March 6, 2025, Trial Tr. 1530:14-17

#### THE TRUTH

Ms. Javice had three one-on-one calls with Mr. Vovor on Aug. 1-2. In connection with these calls, Ms. Javice asked Mr. Vovor to “create data”, and she provided documents to Mr. Vovor that describe various data fields requested by JPMC and an article about the use of synthetic data.

March 6, 2025, Trial Tr. 1528:23-25

# No Conspiracy: August 2 Google Hangout

## Mr. Amar Was Not Involved in Synthetic Data Request



Patrick Vovor  
Director of  
Engineering

F R A N K .

PATRICK VOVOR CROSS

- Q. Okay. Now at no point on the call on August 2nd did Mr. Amar use the words “synthetic data”, did he?
- A. I don’t recall.

PATRICK VOVOR DIRECT

- Q. What did you hear?
- A. He mentioned a list to get real data for PII information—Social Security number, email, phone number—and he mentioned the name of that source being A and two other letters. I know it was three letters acronym starting with A [...]

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 23 of 61

# No Conspiracy: August 2 Google Hangout

## Mr. Vovor's Story

### DIRECT EXAMINATION



Patrick Vovor

Director of  
Engineering

F R A N K .

### PATRICK VOVOR DIRECT

COURT: What else did [Mr. Amar] say, if anything?

A. So he presented—he started the call by saying, okay, this is *my* problem, Chase is asking *me* this, FAFSA data for these 4 million users that I have on my report.

March 6, 2025, Trial Tr. 1531:10-13

### THE TRUTH

The documents and testimony from JPMC witnesses show Mr. Amar had been cut out of the JPMC due diligence process for weeks, since the collapse of the Capital One deal on July 14, 2021.

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 24 of 61

# No Conspiracy: August 2 Google Hangout

## Mr. Vovor's Story



**Patrick Vovor**  
Director of  
Engineering

**F R A N K .**

### PATRICK VOVOR DIRECT

COURT: What did he say?  
WITNESS: [...] I asked him why it is Matt Glazer, so Frank legal and HR at the time, was not in the meeting [...] And Mr. Amar responded that Matt was not – it was not his expertise so that's why he was not there.

March 6, 2025, Trial Tr. 1564:14-21

### PATRICK VOVOR CROSS

COURT: And what did they say?  
WITNESS: [...] Mr. Amar said, this is not [Mr. Glazer's] expertise, but you can talk to him.

March 11, 2025, Trial Tr. 1789:24-1790:1

### PATRICK VOVOR CROSS

THE COURT: At some later point did you speak with Mr. Glazer about your concerns?  
THE WITNESS: No.

March 11, 2025, Trial Tr. 1790:24-1791:1

# No Conspiracy: August 2 Google Hangout

## Mr. Vovor Was Planning to Record the August 2 Call

### CROSS EXAMINATION



**Patrick Vovor**  
Director of  
Engineering

**F R A N K .**

### PATRICK VOVOR CROSS

Q. Now it's true, is it not, that as a result of your conversations before the August 2nd call, you were planning to record that call?

\* \* \*

A. Yes.

\* \* \*

Q. You were concerned that what you were being asked to do even before the call was illegal, right? You told me that.

\* \* \*

A. Yes.

# No Conspiracy: August 2 Google Hangout

## Mr. Vovor's Excuse for Not Recording the Call Lacks Credibility

### CROSS EXAMINATION



**Patrick Vovor**

Director of  
Engineering

**F R A N K .**

### PATRICK VOVOR CROSS

Q. But you didn't record the call.

A. Correct.

Q. Why not?

A. Mismatch.

\* \* \*

Q. Your phone was not with you.

A. No.

Q. Where was it?

A. Somewhere in the house of my parents.

\* \* \*

Q. Did you say to the folks, Mr. Amar and Ms. Javice, can you give me two seconds, I want to take a bathroom break, I want to get a drink of water, and get your phone?

\* \* \*

A. No.

# No Conspiracy: Mr. Amar's August 1



9:51 AM

Ms. Javice sends WhatsApp messages to Mr. Amar ““Need to talk about **data pull** and **strategy**...Ur gonna need to block off ur day” (GX 801-2)



10:12 AM

Ms. Javice and Mr. Amar Call  
(20 minutes)



11:12 AM

Mr. Amar creates  
visitors-geo  
**(GXG 116; DX OA 1514)**



12·47 PM

Mr. Amar edits  
**Frank\_data\_strategy**  
**(DX OA 252: DX OA 251)**



## Data Pull

**EXHIBIT**  
**G-116**  
**\$1.33 Cr. 251 (AIG)**

**GOVERNMENT  
EXHIBIT  
G-116**  
51 23 Cr. 251 (AICR)



# Data Strategy

Digitized by srujanika@gmail.com

1. Local Security Practitioner Exchange: Encouraging local practitioners with the local security and emergency planning experience in managing critical infrastructure to meet with their counterparts from other areas to share and learn the experience and best practices.
  2. Implementing A National Security Strategy: Working with government partners to develop a national security strategy. This will include developing a national security strategy for critical infrastructure, identifying key risks and potential threats to critical infrastructure and developing a national security strategy for critical infrastructure.
  3. Coordinating Critical Facility Response: Continue and expand on the work that has been done to date to provide a framework for responding to critical facility incidents. This will involve working with the relevant parts of both OMB, DHS and DOD to establish a national critical facility response framework and coordinate the activities of OMB, DHS and DOD.
  4. Increasing Critical Security: Encouraging local governments and college/universities from PDRs, DHS and other industry partners to develop and assess their own critical infrastructure. This will involve working with the relevant parts of both OMB and DHS.
  5. Targeted Critical Infrastructure Initiatives: Encouraging frequently used infrastructure to take a more active role in protecting their networks by implementing a range of security measures and processes.

**DEFENDANT'S  
EXHIBIT**

## No Conspiracy: “Records Needed” Spreadsheet

## No Conspiracy: Records Needed

### GOVERNMENT'S OPENING STATEMENT

**“And you will see that Amar got straight to work, he created a document called “records needed” that he shared with Javice. It listed all the data files that JPMorgan needed to confirm 4 million users . . .”**

# No Conspiracy. Records Needed

## Mr. Amar Did Not Create “Records Needed”

	<b>Funnel Steps</b>	<b>Percent Complete</b>	<b>Field Number</b>	<b>Number of Fields</b>
Personal Info - First Name, Last Name, Email, Phone	100%	100.00%	4,265,085.00	
Degree - Major, Year in School, Degree Level	93%	93.00%	3,966,529.05	
School List - address, birthday, college list	97%	90.21%	3,847,533.18	
Student Education - city of high school	92%	82.99%	3,539,730.52	
Kill List A - military status, is married, number of kids	98%	81.33%	3,468,935.91	
<i>Parent Education</i>	99%	80.52%	3,434,246.56	
Independent Financial - cash assets, adjusted gross income	100%	80.52%	3,434,246.56	
Independent Kill List B - student completed tax returns, investments, pers	72%	57.97%	2,472,657.52	
SSN & Gender - Is US citizen	99%	57.39%	2,447,930.94	
<b>Complete</b>			<b>2,100,184</b>	

GOVERNMENT  
EXHIBIT  
**G-72**  
S1 23 Cr. 251 (AKH)

# No Conspiracy. Records Needed

## Mr. Amar Created a Spreadsheet Titled “Funnel Since Aug 1, 2020”

CROSS  
EXAMINATION



**Cory Gaddis**  
Records Custodian

**Google**

- Q. On August 3 at 14:27:37 UTC, the metadata here shows . . . .  
Olivier@withFrank.org took an action to create this document; correct?
- A. Yes.
- Q. And at that time it was called Untitled\_Spreadsheet; correct?
- A. Yes.
- \* \* \*
- Q. August 3, 2021 at 14:27:37 UTC? [ . . . ] Same time as before?
- A. Yes.
- Q. So the GAIA ID ending in 132 took an action to rename the document Funnel Since Aug 1 2020; correct?
- A. Yes.
- Q. To be clear, the account ending in 132, that is the one associated with Olivier@withFrank.org; correct?
- A. Yes.

**No Conspiracy. Records Needed****No Proof What “Funnel Since Aug 1, 2020” Looked Like When Mr. Amar Created It****CROSS EXAMINATION**

**Cory Gaddis**  
Records Custodian

**Google**



- Q. And Mr. Gaddis, you have no way of knowing from the metadata here what Funnel Since August 1, 2020 looked like, do you?
- A. No.
- Q. So you don't know what content was in that document?
- A. No.
- Q. You don't where that content was sourced from?
- A. No.

	Funnel Steps	Percent Complete Fields	Number of Fields
Personal Info - First Name, Last Name, Email, Phone	100%	100.00%	4,265,085.00
Degree - Major, Year in School, Degree Level	93%	93.00%	3,966,529.05
School List - address, birthday, college list	97%	90.21%	3,847,531.18
Student Education - city of high school	92%	82.99%	3,559,735.52
Kill List A - military status, is married, number of kids	98%	81.33%	3,468,35.91
Parent Education	99%	80.52%	3,434,46.55
Independent Financial - cash assets, adjusted gross income	100%	80.52%	3,434,246.55
Independent Kill List B - student completed tax returns, investments, p	72%	57.97%	2,472,657.52
SSN & Gender - Is US citizen	99%	57.39%	2,447,930.94
Complete			2,100,184

?

**GOVERNMENT EXHIBIT**  
**G-72**  
51 23 Cr. 251 (AKH)

**GOVERNMENT EXHIBIT**  
**G-73**  
51 23 Cr. 251 (AKH)

# No Conspiracy. Records Needed

## Ms. Javice Renamed “Funnel Since Aug 1, 2020” to “Records Needed”

CROSS  
EXAMINATION



**Cory Gaddis**  
Records Custodian

**Google**

Q. And if the earlier rename we looked at was 14:27 UTC, is this around 30 minutes later?

A. Yes.

\* \* \*

Q. And there's a Gaia ID. Looking at the chart, [...] what's the email address for that Gaia ID?

A. Charlie@withfrank.org.

Q. All right. And underneath Actions, what does it say under Actions?

A. It says Edit and Rename Previous Title.

Q. And what's the previous title?

A. Funnel Since August 1, 2020.

\* \* \*

Q. Mr. Gaddis, what's the new title?

A. Records Needed.

# No Conspiracy. Records Needed

## Mr. Amar Never Edited or Viewed “Records Needed”

CROSS  
EXAMINATION



Cory Gaddis  
Records Custodian

Google

THE COURT: Is there another change in this document that Mr. Amar is responsible for after the name: Funnel?

THE WITNESS: Not that I could see on there, your honor.

## No Conspiracy: January 14 Recording

# No Conspiracy. January 14 Recording

## Ms. Javice (Again) Directs Both Mr. Vovor and Mr. Amar

**Mr. Amar to Ms. Javice:**

“When did you. I didn’t see an email for a team request”

\* \* \*

“I don’t remember this email”

\* \* \*

“Do me a favor – do an email for the S3 for exactly what you want with the breakdown of the years to Patrick and myself and we’ll get it out.”



GOVERNMENT  
EXHIBIT  
300-T  
S1 23 Cr. 251 (AKH)

## The Recording Proves Mr. Amar Was in the Dark

**AMAR:** Oui Ça c'est 1. Il y en a – elle vivait dans le 23 bushet, tu te rappelles, la fille qu'elle a fait emprisonner à Argenteuil [Burgos], qu'elle a tué. C'est la Pimpette. Elle va s'acheter un châle, il faut exacter le nombre de personnes qu'elle a demandé à la-bas, that's it.

[INTERVIEW] Ok alors quand tu vas l'enterrer, fais-tu une prière. Si je me rappelle bien, les meilleurs livres dans cette liste, ils avaient aussi une partie de leur enterrer sur quelques choses qui ils nous ont donné avec la liste. Y avait bien ça dans... [Rires]. [INTERVIEW] Je veux parler avec les meilleurs qui sont le plus fresh. Il y a un passeur de livres, un nainbou, qui délivre les

*AMAR: Au*

*Are she had answereſt? Augmented, [laughs], that she enri*

[...]

**VOVOR:** Uh ok, la liste enrichie, je l'ai pas, je ne l'ai jamais vu qu'elle est.

*VOVOR: Uh ok, the enriched list, I don't have it, I have never seen it.*

[00:07:00]

**AMAR:** Elle est dans le S3 bucket, c'est toi qui l'a mis là-bas

*AMAR: It is in the S3 bucket, you're the one who put it there.*

**GX300-T**

**VOVOR:** Non, non, non, moi j'ai jamais rien enrichi. Non, moi j'ai donné nos utilisateurs ensuite Charlie elle l'a pris, et elle a fait ce qu'elle voulait avec

*VOVOR: No, no, no, I have never enriched anything. No, I gave it to her, and she did what she wanted with it, with the data she*

**AMAR:** Ok so the FAFSA list.

**VÖVÖR:** Ok.

[00:07:30]

*AMAR: Augmented, [laughs], that she enriched[.]*

*VOVOR: Uh ok, the enriched list, I don't have it, I have never had it. So I  
it is.*

[Minute 7:00]

*AMAR: It is in the S3 bucket, you're the one who put it there, aren't you?*

*VOVOR: No, no, no, I have never enriched anything. No, I gave our users, then Charlie, she took it, and she did what she wanted with it, with the data scientist*

# No Conspiracy. January 14 Recording

## The Recording Proves Mr. Amar Was in the Dark

WhatsApp



Olivier Amar, Jan. 14 2022 3:15 PM UTC (10:15 AM ET)

Patrick says he never touched the ASL list



Charlie Javice, Jan. 14 2022 3:15 PM UTC (10:15 AM ET)

i know\



Olivier Amar, Jan. 14 2022 3:15 PM UTC (10:15 AM ET)

Adam will have to do the ASL list

GOVERNMENT  
EXHIBIT  
801-46  
51 23 Cr. 251(AKH)

# No Conspiracy. January 14 Recording “Marketable Users” Are Just Website Visitors with Cookies

DIRECT  
EXAMINATION



Jenny Zeitler  
Marketing Automation  
Manager  
**F R A N K .**

JENNY ZEITLER CROSS

Q. Someone who is able to be tracked across websites, in the context of retargeting, would be a **marketable user**; is that right?

A. Yes.

March 20, 2025 Trial Tr. 3111:8-11

# No Conspiracy. January 14 Recording

## Only Ms. Javice Edits and Sends User Breakdown Sheet

### DIRECT EXAMINATION



Peter Manning  
**NAXO**



Q. Did the GAIA associated with [Olivier@withfrank.org](mailto:Olivier@withfrank.org) ever edit this document?

A. No.

**From:** Charlie Javice [charlie@withfrank.org]  
on behalf of Charlie Javice <charlie@withfrank.org> [charlie@withfrank.org]  
**Sent:** 1/18/2022 7:14:16 PM  
**To:** Divilek, Sonali [sonali.divilek@chase.com]; Seideman, Neil [neil.seideman@chase.com]; Macdonald, Ryan S [ryan.s.macdonald@jpmorgan.com]; Amar, Olivier [olivier.amar@chase.com]  
**Subject:** User Breakdown  
**Attachments:** User\_Breakdown\_2021\_Update (1).xlsx

Sharing the spreadsheet with user counts with the feedback from Neil and Sonali that is incorporated from earlier today. Feel free to share the breakdown with your team. Olivier has already shared the net number last week with Kelly and Mark.

From the spreadsheet attached, you can see the following:

**5.6MM users** – our total churned users (graduated students) **3.88MM** – Partner Co-Brand sites **0.73MM** = **0.99 net marketable users**

Our team has now cleaned the customer files and just merging them so that it's easy and ready for direct mail and email campaigns you want to test. Thanks for your patience.

Charlie

--  
**Charlie Javice**  
Frank 1 Founder & CEO  
withfrank.org | 914.575.9314  
Student COVID-19 resource

GOVERNMENT EXHIBIT  
1693  
51 23 Cr. 251 (AKH)

## No Conspiracy: February Data Transfer

# No Conspiracy: Data Transfer

## No Evidence Mr. Amar Reviewed or Uploaded the February Transfer Files

### CROSS EXAMINATION



Manole  
Pelarinos

Managing Director,  
Head of Digital  
Channels

 JPMorgan Chase

Q. Did you check the access logs with respect to Amazon Web Services to see who had access to it in 2022?

A. I did not.

Q. **So you have no basis to know whether Mr. Amar had access to Amazon Web Services in 2022?**

\* \* \*

A. **Correct.**

# No Conspiracy: Data Transfer

## No Indication of What Any of the Files Contained

Name	Date Modified	Size	Kind
Frank_1_109373.csv	Jan 14, 2022 at 4:36PM	10.5 MB	CSV Document
Frank_2_113612.csv	Jan 14, 2022 at 4:04PM	10.9 MB	CSV Document
Frank_3_123802.csv	Jan 14, 2022 at 4:05PM	12.3 MB	CSV Document
Frank_4_132567.csv	Jan 14, 2022 at 4:06PM	13.2 MB	CSV Document
Frank_5_122221.csv	Jan 14, 2022 at 4:07PM	11.7 MB	CSV Document
Frank_6_123826.csv	Jan 14, 2022 at 4:08PM	12 MB	CSV Document
Frank_7_120933.csv	Jan 19, 2022 at 8:17PM	11.4 MB	CSV Document
Frank_8_122977.csv	Jan 14, 2022 at 4:10PM	11.9 MB	CSV Document
Frank_9_119668.csv	Jan 14, 2022 at 4:11PM	11.6 MB	CSV Document
Frank_10_113424.csv	Jan 19, 2022 at 8:16PM	10.6 MB	CSV Document
Frank_11_126028.csv	Jan 14, 2022 at 4:13PM	12.2 MB	CSV Document
Frank_12_126575.csv	Jan 14, 2022 at 4:13PM	12.1 MB	CSV Document
Frank_13_131171.csv	Jan 14, 2022 at 4:14PM	12.8 MB	CSV Document
Frank_14_122621.csv	Jan 14, 2022 at 4:15PM	11.8 MB	CSV Document
Frank_15_116619.csv	Jan 14, 2022 at 4:16PM	11.2 MB	CSV Document
Frank_16_112691.csv	Jan 14, 2022 at 4:16PM	10.7 MB	CSV Document
Frank_17_24860.csv	Jan 14, 2022 at 4:58PM	2.3 MB	CSV Document
Frank_18_134955_NotCleaned.csv	Jan 14, 2022 at 4:55PM	11.2 MB	CSV Document
Marketing_Attributes_1.csv	Feb 10, 2022 at 2:49PM	125.9 MB	CSV Document
Marketing_Attributes_2.csv	Feb 10, 2022 at 2:51PM	125.9 MB	CSV Document
Marketing_Attributes_3.csv	Feb 10, 2022 at 2:53PM	100.7 MB	CSV Document
Marketing_Attributes_4.csv	Feb 10, 2022 at 2:54PM	80.4 MB	CSV Document
Marketing_Attributes_5.csv	Feb 10, 2022 at 2:55PM	11.4 MB	CSV Document
Marketing_List1_uid-1.csv	Feb 10, 2022 at 2:24PM	115.3 MB	CSV Document
Marketing_List1_uid-2.csv	Feb 10, 2022 at 2:27PM	115.1 MB	CSV Document
Marketing_List1_uid-3.csv	Feb 10, 2022 at 2:28PM	4.5 MB	CSV Document
Marketing_List2_uid-1.csv	Feb 10, 2022 at 2:30PM	137.5 MB	CSV Document
Marketing_List2_uid-2.csv	Feb 10, 2022 at 2:32PM	137.7 MB	CSV Document
Marketing_List2_uid-3.csv	Feb 10, 2022 at 2:34PM	63.6 MB	CSV Document

GOVERNMENT  
EXHIBIT  
570  
51:23 Cr. 251 (AKH)

GOVERNMENT  
EXHIBIT  
570  
51:23 Cr. 251 (AKH)

# Conscious Avoidance

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 45 of 61

# Mr. Amar Did Not Consciously Avoid Misrepresentations: The Government's Story on June 23

DIRECT  
EXAMINATION



**Mason Young**  
Senior Vice President



- Q. Mr. Young, who from Frank do you recall attending this June 23 meeting?
- A. Ms. Javice, Mr. Glazer, and Mr. Amar.
- \* \* \*
- Q. Mr. Young, do you see there is a question there: How do you define user?
- A. Yes.
- \* \* \*
- Q. Did anyone answer this question during the June 23 meeting?
- A. They did.
- Q. Who do you recall answering that question?
- A. Ms. Javice.

Case 1:20-cr-00251-AKH Document 383-7 Filed 04/28/26 Page 46 of 61

# Mr. Amar Did Not Consciously Avoid Misrepresentations: Matt Glazer Also Missed Ms. Javice's Alleged Misrepresentations

From: Kovalev, Luke [mailto:[Lukasovitch@fincen.gov](mailto:Lukasovitch@fincen.gov)]  
On behalf of Kovalev, Luke [mailto:[Lukasovitch@fincen.gov](mailto:Lukasovitch@fincen.gov)] [mailto:[Lukasovitch@fincen.gov](mailto:Lukasovitch@fincen.gov)]  
Sent: 03/03/2021 10:45:04 AM  
To: Charlie Justice [mailto:[Charlie.Justice@fincen.gov](mailto:Charlie.Justice@fincen.gov)]  
Cc: Kovalev, Luke [mailto:[Lukasovitch@fincen.gov](mailto:Lukasovitch@fincen.gov)]; Agnieszka, Natasja [mailto:[Natasja@fincen.gov](mailto:Natasja@fincen.gov)]; Matt Glaze  
[mailto:[MattGlazer@fincen.gov](mailto:MattGlazer@fincen.gov)]; Michael, Alex [mailto:[Michael@fincen.gov](mailto:Michael@fincen.gov)]  
Subject: RE: [FATCA] 3.1.1 2021 Users to Date.xlsx; 3.1.4 User\_Breakdown.xlsx  
Attachments: 3.1.1 2021 Users to Date.xlsx; 3.1.4 User\_Breakdown.xlsx

Get it done fast! Done - how do I research the issue?  
For example, Jan 2021 has 90,000 users vs 73,111.  
That's:  
Luke Kovalev  
LinkTree LLC  
312.444.3227 Office | 312.711.7111 Cell

From: Charlie Justice [mailto:[Charlie.Justice@fincen.gov](mailto:Charlie.Justice@fincen.gov)]  
Sent: Wednesday, June 23, 2021 10:14 AM  
To: Kovalev, Luke [mailto:[Lukasovitch@fincen.gov](mailto:Lukasovitch@fincen.gov)]  
Cc: Kovalev, Luke [mailto:[Lukasovitch@fincen.gov](mailto:Lukasovitch@fincen.gov)]; Agnieszka, Natasja [mailto:[Natasja@fincen.gov](mailto:Natasja@fincen.gov)]; Matt Glaze  
[mailto:[MattGlazer@fincen.gov](mailto:MattGlazer@fincen.gov)]; Michael, Alex [mailto:[Michael@fincen.gov](mailto:Michael@fincen.gov)]  
Subject: Re: [FATCA] 3.1.1 2021 Users to Date.xlsx; 3.1.4 User\_Breakdown.xlsx

They should note this is not intended CAC for the 3.1.1 – it is purely for paid speed FATCA. The intended CAC is what you guys gave them in a prior.  
Charlie  
On Tue, Jun 22, 2021 at 9:59 PM Charlie Justice <[Charlie.Justice@fincen.gov](mailto:Charlie.Justice@fincen.gov)> wrote:  
3.2.1 – in FATCA only yes the SHM we did not issue an E.L.I.  
3.1.1 – in FATCA only  
3.1.4 – testing new products & dashboard launch (not planned towards lowering CAC. The speed is dictated there.)

Attachments: 3.1.1 2021 Users to Date.xlsx; 3.1.4 User\_Breakdown.xlsx

Charlie Justice [mailto:[Charlie.Justice@fincen.gov](mailto:Charlie.Justice@fincen.gov)]  
Sent: Wednesday, June 23, 2021 10:14 AM  
To: Kovalev, Luke [mailto:[Lukasovitch@fincen.gov](mailto:Lukasovitch@fincen.gov)]  
Cc: Kovalev, Luke [mailto:[Lukasovitch@fincen.gov](mailto:Lukasovitch@fincen.gov)]; Agnieszka, Natasja [mailto:[Natasja@fincen.gov](mailto:Natasja@fincen.gov)]; Matt Glaze  
[mailto:[MattGlazer@fincen.gov](mailto:MattGlazer@fincen.gov)]; Michael, Alex [mailto:[Michael@fincen.gov](mailto:Michael@fincen.gov)]  
Subject: RE: [FATCA] Retention Definitions\_CJ\_V2.docx  
Attachments: Retention Definitions\_CJ\_V2.docx

On the road but wanted to provide RE: 3.1.1. AKA?  
I am not sure if I have the right one but wanted to provide it.  
FATCA completes other laws are behavioral and  
for each opt out is about you are up to. It is not like yet  
mean and free money.... It's  
for now two can know that the bottom left of the doc to upload this and then see what we are pull on  
relationships CTR, as the others are covered in VDR already.

On Mon, Jun 28, 2021 at 7:02 PM Kovalev, Luke <[Lukasovitch@fincen.gov](mailto:Lukasovitch@fincen.gov)> wrote:  
Thank you for sending Charlie. Based on our review as well as some feedback we just received from Capital One, we have added a couple comments / clarifying questions for the word doc you sent. We should try to incorporate as much of this.

Attachments: 3.2.1 CAC Summary.xlsx; 3.1.1 2021 Users to Date.xlsx; 3.1.4 User\_Breakdown.xlsx

Why are they so different? All 3 have different numbers (3.2.1 says 4, 3.1.4 says 30k and 3.1.1 says less than 10k)  
Luke Kovalev  
LinkTree LLC  
312.444.3227 Office | 312.711.7111 Cell

FDA Confidential Treatment Requested by JPMorgan Chase Bank, N.A.  
CONFIDENTIAL

GOVERNMENT EXHIBIT 3027  
JPMC\_00049237  
USAO Ref 00000466

From: Kovalev, Luke [mailto:[Lukasovitch@fincen.gov](mailto:Lukasovitch@fincen.gov)]  
Sent: Tuesday, June 29, 2021 8:47:20 PM  
To: Charlie Justice [mailto:[Charlie.Justice@fincen.gov](mailto:Charlie.Justice@fincen.gov)]  
Cc: Kovalev, Luke [mailto:[Lukasovitch@fincen.gov](mailto:Lukasovitch@fincen.gov)]; Agnieszka, Natasja [mailto:[Natasja@fincen.gov](mailto:Natasja@fincen.gov)]; Matt Glaze  
[mailto:[MattGlazer@fincen.gov](mailto:MattGlazer@fincen.gov)]; Michael, Alex [mailto:[Michael@fincen.gov](mailto:Michael@fincen.gov)]  
Subject: RE: [FATCA] Retention Definitions\_CJ\_V2.docx  
Hi question from 3.1.4 to comment E, we have over 100k profilers in that even this just some Checklist for speed right? There are only 20k users for Kovalev in 3.1.4  
Luke Kovalev  
LinkTree LLC  
312.444.3227 Office | 312.711.7111 Cell

FDA Confidential Treatment Requested by JPMorgan Chase Bank, N.A.  
CONFIDENTIAL

GOVERNMENT EXHIBIT 3026  
JPMC\_00044789  
USAO Ref 00000467

GOVERNMENT EXHIBIT 3027  
S1 23 Cr. 251

GOVERNMENT EXHIBIT 3023  
S1 23 Cr. 251

GOVERNMENT EXHIBIT 3026  
S1 23 Cr. 251

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 47 of 61

# Mr. Amar Did Not Consciously Avoid Misrepresentations: The Truth

CROSS  
EXAMINATION



Mason Young  
Senior Vice President



Q. Now, am I right that the definition of a user was provided as well on the **June 23 meeting** that we are talking about now?

A. Yes.

\* \* \*

COURT: Do you remember, in this particular instance when you recall that Ms. Javice gave you a definition of user, that she turned to Mr. Amar for any kind of information?

WITNESS: I don't recall that.

COURT: Do you recall seeing Mr. Amar on the screen at the time you heard this definition of user?

WITNESS: We are talking about three and a half years ago. I'm --

COURT: I'm not criticizing, sir. I am just asking for your recollection.

WITNESS: **I don't recall seeing Mr. Amar's face at the time that Ms. Javice or Capital One was asking about the definition of a user.**

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 48 of 61

# Mr. Amar Did Not Consciously Avoid Misrepresentations: The Government's Story on July 8

DIRECT  
EXAMINATION



**Mason Young**  
Senior Vice President



- Q. Mr. Young, do you recall a meeting that occurred around July 8 of 2021?
- A. I do.

March 12, 2025 Trial Tr. 2145:19-21

- Q. Who, from Frank, do you recall participating in this meeting?
- A. Ms. Javice and Mr. Amar.
- Q. How did this meeting take place?
- A. Over Zoom.
- Q. Who do you recall spoke at the meeting?
- A. Primarily Ms. Javice, with Mr. Amar answering any questions that Ms. Javice deferred to him.

March 12, 2025 Trial Tr. 2146:4-11

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 49 of 61

## Mr. Amar Did Not Consciously Avoid Misrepresentations: The Government's Story on July 8

DIRECT  
EXAMINATION



Mason Young  
Senior Vice President

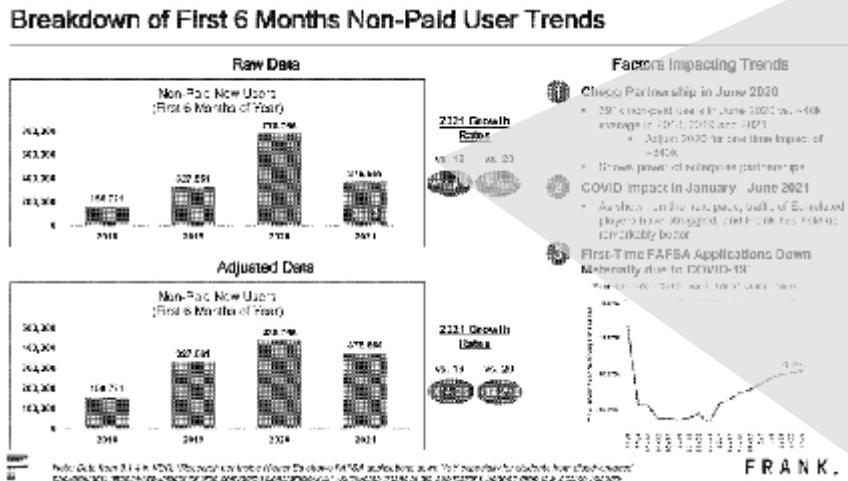


- Q. Mr. Young, was the information on this slide [8] discussed during the July 8 meeting?
- A. Yes.
- Q. Who do you recall, best that you can remember, discussing the information on this slide?
- A. Combination of Ms. Javice and Mr. Amar.
- Q. Do you see at the top where it says: Breakdown of first six months of non-paid users?
- A. Yes.

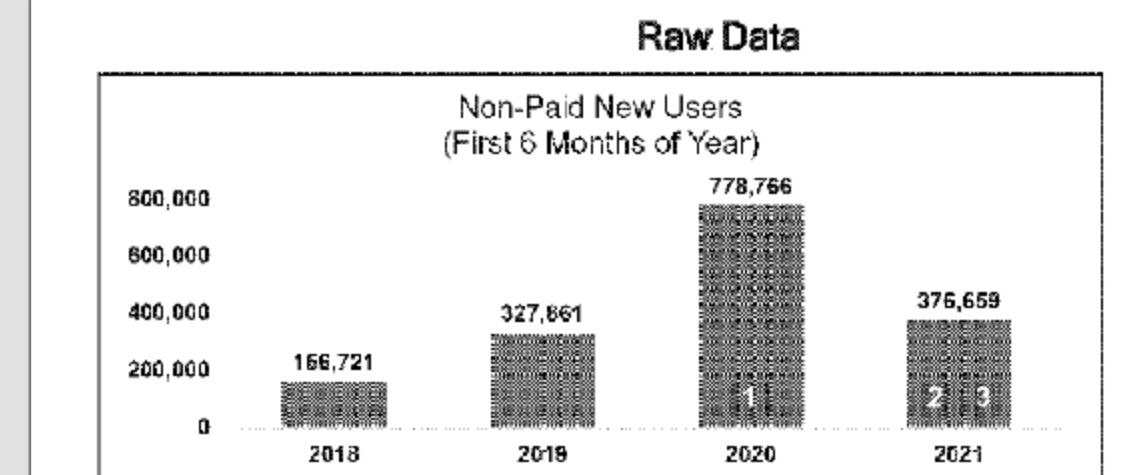
# Mr. Amar Did Not Consciously Avoid Misrepresentations: The Government's Story on July 8

<b>From:</b>	Cowan, Houston [HCowan@EnviroNet.com]
<b>on behalf of</b>	Cowan, Houston <HCowan@EnviroNet.com> [HCowan@EnviroNet.com]
<b>Sent:</b>	7/18/2021 04:06:28 PM
<b>To:</b>	Charlie Javier [charlie.javier@withthrust.org]; Oliver Amar [oliver.amar@withthrust.org]; LT-ProjectFrontier@EnviroNet.com; jessica.buccardo@capitalone.com; Amanda Christiansen [amanda.christiansen@capitalone.com]; Mason Young [mason.young@capitalone.com]; Joseph Casella [joseph.casella@capitalone.com]; Roskovich, Luke [Luke.Roskovich@EnviroNet.com]
<b>CC:</b>	
<b>Subject:</b>	RE: Project Frontier
<b>Attachments:</b>	Project Frontier Cap
All,	
Ahead of the discussion, find attached.	
Best,	
Houston Cowan	
EnviroNet LLC	
C 262-758-3318	
Original Appointment —	
From: Cowan, Houston	
Sent: Thursday, July 8, 2021 11:15 AM	
To: Cowan, Houston; Charlie Javier; jessica.buccardo@capitalone.com; Joe	
Cz; Roskovich, Luke	
Subject: Project Frontier Discussion w	
Where: Thursday, July 8, 2021 12:30 PM	
Where: <a href="https://EnviroNet.us/19">https://EnviroNet.us/19</a>	
Join Zoom Meeting	
<a href="https://EnviroNet.us/190083111">https://EnviroNet.us/190083111</a>	
Meeting ID: 960 0833 9258	
Passcode: 849687	
One tap mobile:	
+19292056999,,96008339258#,,	
FOIA Confidential Treatment Requested	
CONFIDENTIAL	

**From:** Cowan, Houston [HCowan@lontree.com];  
on behalf of Cowan, Houston <HCowan@lontree.com> [HCowan@lontree.com]  
**Sent:** 7/8/2021 4:06:26 PM  
**To:** Charlie Javice [charlie@withfrank.org]; Olivier Amar [olivier@withfrank.org]; LT-ProjectFrontier@lontree.com; RAHUL JINDAL [rahul.jindal@capitalone.com]; Amanda Christianson [amanda.christianson@capitalone.com]; Mason Young [mason.young@capitalone.com]; jessica.boccardo@capitalone.com; joseph.casola@capitalone.com  
**CC:** Koskopolis, Luke [LKoskopolis@lontree.com]  
**Subject:** RE: Project Frontier Discussion with Capital One  
**Attachments:** Project Frontier Capital One Meeting Follow-Up (07.08.2021).pdf



## Breakdown of First 6 Months Non-Paid User Trends



**GOVERNMENT  
EXHIBIT  
3040**

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 51 of 61

# Mr. Amar Did Not Consciously Avoid Misrepresentations: The Truth

CROSS  
EXAMINATION



Mason Young  
Senior Vice President



Q. Sir, isn't it a fact that you joined in the middle of the meeting, 21 minutes into it before you got on?

A. Sounds like you know more than I do.

Q. Well, forget what I know?

\* \* \*

Q. Okay. Do you recall that you were only on that call for a sum total of 12 minutes on that day?

A. I don't recall.

Q. Do you recall that you dropped off eight minutes before the call ended?

A. I don't recall.

\* \* \*

Q. **So as you sit here today, you don't even know if Mr. Amar attended that meeting, you just know he was invited to it, right?**

A. Correct.

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 52 of 61

# Mr. Amar Did Not Consciously Avoid Misrepresentations: The Government's Story on July 12

REDIRECT  
EXAMINATION



Sindhu  
Subramaniam  
Vice President,  
Corporate  
Development and M&A

 JPMorgan Chase

- Q. And when did Mr. Amar speak relative to the discussion about users [on July 12]?
- A. Just before.

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/25/25 Page 53 of 61

# Mr. Amar Did Not Consciously Avoid Misrepresentations: The Truth

CROSS  
EXAMINATION



Sindhu  
Subramaniam

Vice President,  
Corporate  
Development and M&A

- Q. Fair to say you don't remember anyone's camera being on at any point during the session?
- A. I do not know.
- Q. So, other than when Mr. Amar was actually talking about growth and partnerships and how they would grow the business, fair to say you don't know what he was actually doing?
- A. I wouldn't know.
- Q. You don't know if he was even in front of his computer screen listening to the discussion other than when what he was actually speaking during the meeting; true?
- A. I don't know.

# Mr. Amar Did Not Consciously Avoid Misrepresentations: Even When Pushed, Witnesses Couldn't Remember

## REDIRECT EXAMINATION



Ryan  
MacDonald  
Head of Growth for  
Financial Products

JPMorganChase

Q. Well does that refresh your recollection about what Mr. Amar said during the July 12, 2021 meeting?  
[ . . . ]

A. Again, my recollection is that he was specifically discussing **elements of their marketing strategy**, yeah.

Q. Did [Mr. Amar] say anything about quantities?  
A. I don't – **I still don't recall** Mr. Amar saying anything specific about quantities or users.

\* \* \*

Q. You can't say who was in this – in the room?  
A. I know that Ms. Javice was there. **I don't recall if Mr. Amar spoke to this section or not.**

# Beware of the Rebuttal

## Beware of the Rebuttal

### REDIRECT EXAMINATION



**Steve Stolls**

Executive Vice President of  
Sales and Marketing

ASL Marketing



- Q. If we can zoom in on Mr. Amar's e-mail on the top? Do you see where he says: I'd like the tots to be 4.5 million, so yes, please?
- A. Yes.
- Q. Other than 4.5 million, do you recall Mr. Amar requesting any other volume of student data?
- A. I don't. I don't recall.

**From:** Denise Lyn<IMCEAEX-  
\_O=EXCHANGELABS\_OU=EXCHANGE+20ADMINISTRATIVE+20GROUP+20+28FYDIBOHF23SPDLT+29\_CN=RECIPIENTS\_CN=D85A29A6D37742A3AAAFA2B7ACBC3898A-  
DLYN@namprd15.prod.outlook.com>  
**Sent:** Mon 8/2/2021 3:31:28 PM Coordinated Universal Time

**To:** Steve Stolls<stolls@aslmarketing.com>  
**Sent on behalf of:** Denise Lyn <IMCEAEX-  
\_O=EXCHANGELABS\_OU=EXCHANGE+20ADMINISTRATIVE+20GROUP+20+28FYDIBOHF23SPDLT+29\_CN=RECIPIENTS\_CN=D85A29A6D37742A3AAAFA2B7ACBC3898A-  
DLYN@namprd15.prod.outlook.com>  
**Subject:** WithFrank.org- College Market

**From:** Denise Lyn<IMCEAEX-  
\_O=EXCHANGELABS\_OU=EXCHANGE+20ADMINISTRATIVE+20GROUP+20+28FYDIBOHF23SPDLT+29\_CN=RECIPIENTS\_CN=D85A29A6D37742A3AAAFA2B7ACBC3898A-  
DLYN@namprd15.prod.outlook.com>  
**Sent:** Mon 8/2/2021 3:31:28 PM Coordinated Universal Time

I just got off the phone with the prospect, he is in the college market

<http://withfrank.org/>

He has a house file that he wants to append (augment data to). The second part is postal mailing.

He is looking for 10MM records and would like a call.

He is looking to move very "quickly" on this and would like a call today.

Are you available today for a call?

**He is looking for 10MM records and would like a call.**

**GOVERNMENT  
EXHIBIT  
2302  
S1 23-Cr-251 (AKH)**

## Beware of the Rebuttal

CROSS  
EXAMINATION



Patrick Vovor  
Director of  
Engineering

F R A N K .

COURT: Did they mention . . . that you could speak with [Mr. Glazer]?

WITNESS: I believe so.

COURT: [And] what did they say?

WITNESS: [...] **Mr. Amar said, this is not his expertise, but you can talk to him.**

## Beware of the Rebuttal

REDIRECT  
EXAMINATION



Patrick Vovor  
Director of  
Engineering

F R A N K .

- Q. What happened to Mr. Glazer in August of 2021, with respect to his role at Frank?
- A. He left Frank.

## Beware of the Rebuttal

REDIRECT  
EXAMINATION



Mason Young  
Senior Vice President



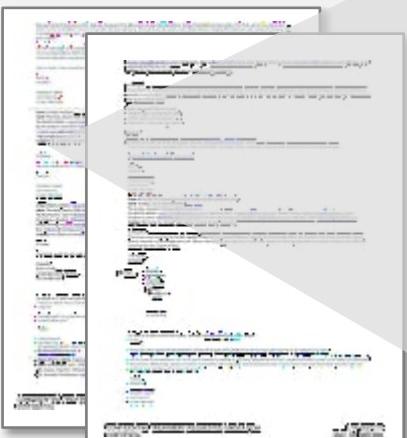
- Q. Mr. Young, do you see where it says: Project Frontier Discussion with Capital One?
- A. Yes.
- Q. And then it says July 8, 12:30 to 1:00 p.m.?
- A. Yes.
- \* \* \*
- Q. What does it say above Project Frontier discussion with Capital One?
- A. Olivier@withFrank.org has accepted this invitation.

## Beware of the Rebuttal

### REDIRECT EXAMINATION



**Mason Young**  
Senior Vice President



- Q. I want to direct your attention to this e-mail: . . . We have some follow-up questions and thought it would be best to address them directly with Olivier on a 30-minute call. Do you see that?
- A. I do.
- Q. And you see that there are certain topics listed there?
- A. Yes
- Q. So student age, FAFSA starts and completes . . .
- A. . . . Because in his role as head of growth at Frank, he was responsible for customer acquisition . . .

**From:** RAHUL JINDAL <[rrahul.jindal@capitalone.com](mailto:rrahul.jindal@capitalone.com)>  
**Sept:** Wednesday, July 7, 2021 2:29 PM  
**To:** Cowan, Houston <[H.Cowan@liontree.com](mailto:H.Cowan@liontree.com)>  
**Cc:** Amanda Christianson <[amanda.christianson@capitalone.com](mailto:amanda.christianson@capitalone.com)>; Agarwal, Nikhil <[nikhil.agarwal@liontree.com](mailto:nikhil.agarwal@liontree.com)>; Mason Young <[mason.young@capitalone.com](mailto:mason.young@capitalone.com)>; Koskova, Luka <[L.Koskova@liontree.com](mailto:L.Koskova@liontree.com)>; Florian Ceterberndt <[florian.ceterberndt@capitalone.com](mailto:florian.ceterberndt@capitalone.com)>; Michael, Alex <[AMichael@liontree.com](mailto:AMichael@liontree.com)>  
**Subject:** Re: [External Sender] RE: Call w/ Charlie & mtg; meetings

Houston,  
I hope that this email finds you well. Appreciate you organizing time with the team yesterday, following on from that meeting we had some follow up questions and thought it would be best to address them directly with Olivier on a 30 mins call today, if possible. Would you mind asking if he can connect with us at 5:30pm today?

Topics we would like to discuss:  
- Student age / demographic split  
- FAFSA starts and completion  
- Retention/cross-sell by product

GOVERNMENT  
EXHIBIT  
1691  
S1 23 Cr. 251 (AKH)

# Conclusion